

MORASH, MELANIE

From: MORASH, MELANIE
Sent: Saturday, June 11, 2016 1:24 PM
To: J. Wesley Hawthorne
Cc: Plate, Mathew; Shaffer, Caleb; DIAZ, ALEJANDRO; Cynthia Woo; Lawrence McGuire; Leslie Lundgren; Lora Battaglia; Rose Condit; Sabrina Morales; Wenqian Dou; Elizabeth Brown; Heather O'Cleirigh; Joseph Innamorati; Linda Niemeyer; Michele Yuen; Morgan Gilhuly; Nancy-Jeanne LeFevre; Peter Bennett; Peter Scaramella; Rebecca Mora; Shau Luen Barker; Shaun Moore; Todd Maiden; Wendy Feng
Subject: EPA Comments - Triple Site - The King's Academy - Revised Mitigation Plan for Small Auxiliary Gym - Response requested by Friday, June 17th

Good afternoon, Wes,

Please consider the following set of comments on your mitigation plan for The King's Academy's small auxiliary gym, mainly regarding the diagnostic testing. **A revised mitigation plan and response-to-comments letter by Friday, June 17th would be appreciated.** Please let me know if you would like to schedule a call with your mitigation contractor to discuss further.

1. Page 4, SSDS Specifications, second paragraph (¶), third bullet – refers to Dwyer Magnahelic gauge Part #2001. The specified range of vacuum (0-1.0" wc) is incorrect for the model fan specified and likely to be used. The appropriate gauge would be Part #2005.
2. Page 5, Diagnostic Testing Description Section, first ¶ – In the second sentence it states, “diagnostic testing can be performed to guide the design” as this is the approach EPA recommends during the installation of the SSDS. However the remaining text and following paragraphs tend to indicate that diagnostic testing is something different and done at another time and not during the system installation. The point of diagnostic testing during the installation of a presumptive system is to ensure that the system provides some level of coverage to the slab, thereby minimizing the risk that follow-up sampling may still show a problem. If it can be demonstrated that the slab has good coverage during the system installation, then there is a greater chance that the follow-up sampling will be acceptable. If the system is installed and no diagnostic testing is done, then there is no way of knowing the overall coverage. EPA is not requesting that diagnostic testing be done prior to the system installation, so it is not accurate to state that it would add 30 days onto the schedule.
3. Page 5, Diagnostic Testing Description Section, third ¶ – The design for diagnostic testing lacks a basic understanding of the principal for doing diagnostic testing. The extraction point is located on the end of a rectangular building and the test locations will be in the four corners, so the design is an all or very limited approach. One would expect the two test locations in the corners adjacent to the extraction point to show influence even at lower vacuum levels due to their proximity to the extraction point. However, the other two test holes are at the far ends of the building and may not see influence at any applied vacuum. If this is the case, then the data gleaned from the testing does nothing to assist with the overall design or modifications to the design. There must be a way to show how far vacuum extends at each increased application of vacuum so we understand where to place extraction points or how to size a blower. A contingency is necessary in case there is no influence seen at the other end of the slab after applying a vacuum.

4. Page 5, Diagnostic Testing Description Section, fourth ¶, second sentence – The assumption is that the shop vacuum will be adequate to show an influence all the way across the slab. However, if no influence is demonstrated, then there should be some intermediate test hole locations to show where there is coverage at applied vacuums.
5. Page 5, Diagnostic Testing Description Section, fourth ¶, sixth sentence – The HS fans are noisier and would require a muffler, but shouldn't be any louder than the GP501 if a muffler is used. The HS fans would most likely require a second visit to the site as they would be ordered and shipped at a later date.
6. Page 5, Diagnostic Testing Description Section, last ¶ – The test or observation holes can be smaller as recommended in the VIMA. A hole small enough to accommodate the tubing from the micromanometer is all that is needed for pressure differential monitoring. The hole can be ¼" in diameter and would be almost undetectable when restoring the floor back to original condition.
7. Page 6, Implementation Schedule Section, first ¶ – This implies that any diagnostic testing is separate from the installation of the system. EPA would like to see the diagnostic testing be used during the system installation to condense the schedule and to guide the installation. EPA recognizes that additional equipment might have to be ordered and installed at a later date, but the system can be installed and ready for operation when the new fan arrives. This is preferable to adding 30 days to the schedule.

Regards,

Melanie Morash

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From: J. Wesley Hawthorne [mailto:hawthornej@locustec.com]

Sent: Thursday, May 12, 2016 8:09 PM

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Subject: RE: EPA Comments - Triple Site - The King's Academy - Revised Mitigation Plan for Small Auxiliary Gym

Melanie:

The attached mitigation plan has been revised to address these comments. Also, the laminated signs have been posted on the doors to the small auxiliary gym.

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